

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

WESTCHESTER FIRE INSURANCE COMPANY	:	
as subrogee of JURYS DOYLE HOTEL GROUP	:	
USA, LTD. d/b/a JURYS DOYLE HOTEL, LLC	:	CIVIL ACTION NO. 05-cv-11375-MLW
	:	
Plaintiff	:	
v.	:	
	:	
DJ PLUMBING & HEATING, INC.	:	
	:	
Defendant	:	

**PLAINTIFF'S INITIAL DISCLOSURE PURSUANT TO RULE 26(a)(1)
OF THE FEDERAL RULES OF CIVIL PROCEDURE**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, plaintiff,
Westchester Fire Insurance Company a/s/o of Jurys Doyle Hotel Group USA, LTD. d/b/a
Jurys Doyle Hotel, LLC submits the following.

I. Rule 26(a)(1)(A) - The following individuals are likely to have discoverable
information relevant to plaintiff's claim.

Plaintiff believes that the following witnesses have information regarding the incident
and the damages resulting from the incident:

David Johanson
DJ Plumbing & Heating, Inc.
250 North Street
Suite B1
Danvers, MA 01923

Chris E. Scott, Ph.D.
Patricio Mendez
Exponent
Framingham, MA

Stephen Johnston
Peter Hilary
Jurys Doyle Hotel LLC
154 Berkeley Street
Boston, MA 02116

Frank Geary
Karen Walsh
Walter K. McDonough
Anthony Papantonis
Mark DiNapoli
Brian DiBlasi
Scott Littlejohn
Suffolk Construction Co., Inc.
65 Allerton Street
Boston, MA 02119

Joseph R. Feters
National General Adjuster
Engle Martin & Associates, Inc.
276 Washington Street
Box #304
Boston, MA 02108

Jack Halliwell
Steve Lemmo
Russ Drumee
Halliwell Engineering Associates, Inc.
865 Waterman Avenue
East Providence, RI 02914

JoAnne Massey
Nesi D. Minley
ACE Westchester Specialty Group
500 Colonial Ctr. Pkwy.
Suite 200
Roswell, GA 30076

Stephen Cunningham
SCA Consultants Limited
Spanish Parade House
13 Lower Merchants Road
Galway
Ireland

Michael E. Liu
Gary Kane
The Architectural Team, Inc.
50 Commandant's Way
Chelsea, MA 02150

William J. Goode, P.E., C.P.E.
W. J. Goode Corporation
1600 Providence Highway
Walpole, MA 02081

Plaintiff believes that the following witnesses have information regarding the damages at issue:

Wozny/Barbar & Associates
1090 Washington Street
Hanover, MA 02339

Covino Environmental Associates Inc.
309 Wildwood Avenue
Woburn, MA 01801

Lexon Building Corp.
P.O. Box 174
Lexington, MA 02173

Glenn S. Duquette
Vice President
Broadway Electrical
295 Freeport Street
Boston, MA 02122

Al Kahn
Capitol Electric Corp
1801 Blue Hill Avenue
Boston, MA 02126

SimplexGrinnell
63 Nahatan Street
Boston, MA 02062

Larry Donahue
Ralph Pill Electric Supply Co.
307 Dorchester Avenue
Boston, MA 02127

J. David Riddle, Project Manager
Don Bjork
ThyssenKrupp Elevator
665 Concord Avenue
Cambridge, MA 02138

Colony Hardware Supply Co. Inc.
1188 Dorchester Avenue
Boston, MA 02125

William J. Gardner
Vice President
E.M. Duggan Inc.
140 Will Drive
Canton, MA 02021

Ferangle O'Donnell
Jeffery Hinriques
CYN Environmental Services
a/k/a CYN Oil Corporation
1771 Washington Street
Stoughton, MA 02072

Peter Minichiello
Mecca Construction Corp.
10 W. Gill Street
Woburn, MA 01801

John Thompson
Chapman Waterproofing Company
395 Columbia Road
Boston, MA 02125

Paul Buonopane
Bonaco Inc.
23 Walkers Brook Drive
Reading, MA 01867

Century Drywall Inc.
1952 Louisquippet Pike
Lincoln, RI 02866

John Jennette, Project Manager
Dennis Sacco, Jr., Operations Manager
Limbach Company LLC
180 New Boston Street
Woburn, MA 01801

Steve Yoder, Account Manager
Atlantic Contracting Specialists
15 Perwal Street
Westwood, MA 02090

Dick Lucy, President
John Murphy
Sytec Controls
300 Pond Street
Randolph, MA 02368

Bill Murphy
Project Manager
Harrington Bros., Corp.
1043 Turnpike Street
Stoughton, MA 02072

Robert O'Connell, Jr.
R. P. O'Connell, Inc.
17 Tech Circle
Natick, MA 01760

Edward C. Karcher
Applications Engineer
Gourley Co.
80 Felton Street
Waltham, MA 02453

Integrated Electrical Systems, Inc.
407R Mystic Avenue
Unit 12
Medford, MA 02155

Rent-A-Tool
777 North Shore Road
Revere, MA 02151

Front Line
3 Berkley Road
Milford, MA 01757

Marr Equipment Corp.
One D Street
South Boston, MA 02127

Mark Jennings
James W. Flett Co., Inc.
800 Pleasant Street
Belmont, MA 02478

Patrick A. Barb
Project Managers
S&F Concrete Contractors Inc.
166 Central Street
Hudson, MA 01749

Waldo Bros. Company
202 Southamptton Street
Boston, MA 02118

Christopher Ritchie
Northeastern Door Co., Inc.
130 Jackson Street
Canton, MA 02021

Peter Kidney
Estimator/Project Manager
SOEP Painting Corporation
263 Commercial Street
Malden, MA 02148

In addition to the foregoing witnesses, plaintiff includes all individuals identified in the documents produced or testimony given during the course of discovery.

II. Rule 26(a)(1)(B) – the following documents, data compilations and tangible things in the possession, custody or control of the plaintiff are relevant to this action:

See documents Bates numbered WFI0001- WFI0928.

Plaintiff reserves the right to supplement this disclosure.

III. Rule 26(a)(1)(C) - see documents Bates numbered WFI0001- WFI0928.

Plaintiff's total damages are \$1,377,855.96, not including interest, costs, and fees.

IV. Rule 26(a)(1)(D) – N/A.

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(215) 665-2013 (facsimile)

CERTIFICATE OF SERVICE

I, PATRICK J. LOFTUS, III, hereby certify that a copy of the foregoing Plaintiff's Initial Disclosure has been served upon counsel this 24th day of March, 2006 by First Class Mail, postage pre-paid addressed as follows:

John Stadler, Esquire
Nixon Peabody LLP
100 Summer Street
Boston, MA 02110-2131

BY: /s/ Patrick J. Loftus, III, Esq

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